

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,
Plaintiff

V.

VANDERLEI RODRIGUES DEARAUJO
a/k/a “Neneco”,
Defendant

Criminal No. 1:19-cr-10210-NMG

DEFENDANT VANDERLEI DEARAUJO’S MOTION *IN LIMINE*
TO ADMIT PAYSTUBS AND EMPLOYMENT RECORDS

Defendant Vanderlei DeAraujo hereby moves in limine for an order allowing the admission of his paystubs and employment records. Subpoenas have been authorized by the Court for these specific records, pursuant to Federal Rules of Criminal Procedure 17(c). Additionally, paystubs and W-2 documents, were also provided to the government by undersigned counsel, which the Defendant intends to use at trial.

As grounds therefore, the records sought support Mr. DeAraujo’s defense in this matter. The Defendant expects the documents requested in subpoena’s should be received, with a completed affidavit certification from a keeper of the records of the three (3) companies. Mr. DeAraujo would be prejudiced if these documents were not admitted at trial in support of his defense.

Respectfully Submitted
For the Defendant,
VANDERLEI DEARAUJO,



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Dated: March 9, 2020

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 9, 2020.


Sara Attarchi